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***PROPOSED COUNSEL FOR THE DEBTORS  
AND DEBTORS-IN-POSSESSION***

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<b>In re:</b>		<b>Chapter 11</b>
	§	
<b>SPHERATURE INVESTMENTS LLC, et</b>	§	<b>Case No.: 20-42492</b>
<b>al.</b>	§	
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>Jointly Administered</b>
	§	

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**AGREED MOTION TO: (A) VACATE THE ORDER (I) AUTHORIZING THE  
DEBTORS TO KEEP CERTAIN INFORMATION IN SCHEDULES OF ASSETS AND  
LIABILITIES CONFIDENTIAL; (II) APPROVING FORM AND MANNER OF NOTICE  
TO CERTAIN POTENTIAL CLAIMANTS; AND (III) ESTABLISHING  
SUPPLEMENTAL DEADLINE TO FILE PROOFS OF CLAIM FOR CERTAIN  
POTENTIAL CLAIMANTS, (B) SET OBJECTION DEADLINE, AND  
(C) EXTEND THE BAR DATE**

Spherature Investments LLC (“Spherature”), together with its affiliates identified herein, as debtors and debtors-in-possession (collectively, the “Debtors”), hereby file this *Agreed Motion to: (A) Vacate the Order (I) Authorizing the Debtors to Keep Certain Information in Schedules of Assets and Liabilities Confidential; (II) Approving Form and Manner of Notice to Certain Potential Claimants; and (III) Establishing Supplemental Deadline to File Proofs of Claim for*

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<sup>1</sup> The “Debtors” in the above-captioned jointly administered chapter 11 bankruptcy cases (“Cases”) are: Spherature Investments LLC EIN#5471; Rovia, LLC EIN#7705; WorldVentures Marketing Holdings, LLC EIN#3846; WorldVentures Marketplace, LLC EIN#6264; WorldVentures Marketing, LLC EIN#3255; WorldVentures Services, LLC EIN#2220.

*Certain Potential Claimants, (B) Set Objection Deadline, and (C) Extend the Bar Date* (the “Motion to Vacate”). In support of the Motion to Vacate, the Debtors respectfully state as follows:

**I.**  
**RELIEF REQUESTED**

1. On December 21, 2020 (the “Petition Date”), the Debtors filed their respective voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), thereby initiating the above-captioned cases (the “Cases”).

2. On March 19, 2021, Melody Yiru filed a *Motion for Limited Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(D) to File Her Motion for Class Certification in the District Court and to Confirm No Automatic Stay Applies to the Non-Debtor Parties, or in the Alternative, for an Order Applying Fed. R. Bankr. Proc. 7023, Pursuant to Fed. R. Bankr. Proc. 9014(C) to Permit the Filing of a Motion for Class Certification in this Court and Related Relief* (the “Motion to Lift Stay”) [Docket No. 189]. The Motion to Lift Stay is scheduled to be heard on June 22, 2021.

3. On March 23, 2021, the Debtors filed the *Motion for Order (I) Authorizing the Debtors to Keep Certain Information in Schedules of Assets and Liabilities Confidential; (II) Approving Form and Manner of Notice to Certain Potential Claimants; and (III) Establishing Supplemental Deadline to File Proofs of Claim for Certain Potential Claimants* (the “Motion”).

4. The Debtors have been in informal discussions with counsel for Melody Yiru (“Yiru”) regarding the Motion and its proposed order (the “Order”) and the Motion to Lift Stay. As part of these discussions, the Debtors agreed to extend the objection deadline to the Motion through June 20, 2021.

5. The Debtors also agreed to extend the bar date (the “Bar Date”) to June 20, 2021 at 5:00 p.m., solely with respect to the filing of proofs of claim by Melody Yiru, which the Court approved. *See* Docket No. 250.

6. Other than the informal discussions with Yiru, no objections have been filed as to the Motion. On June 3, 2021, prior to the informally extended deadline to object, the Court entered the Order at Docket No. 293.

7. The Debtors and Yiru respectfully request that the Court vacate the Order, extend the objection period as to the Motion and the Motion to Lift Stay through and until June 26, 2021 and set the matter to be heard on July 13, 2021. The Debtors and Yiru also request that the Court further extend the Bar Date to August 1, 2021, for Yiru and other former representatives or current representatives of the Debtors, but only to the extent they could be classified in the purported class, (in such capacities, collectively, the “Claimants”).

## **II.** **NOTICE**

8. The Debtors will provide notice of this Motion to: (a) the Office of the United States Trustee; (b) to each of the Debtors’ secured lenders; (c) counsel to the agents of the Debtors’ secured lenders; (d) the Committee; (e) the Internal Revenue Service; (f) all parties in interest who have formally appeared and requested notice; and (g) and all parties who have requested special notice from the Debtors. The Debtors respectfully submit that no further notice of this Application is required.

9. The pleadings in these Cases and supporting papers are available on the Bankruptcy Court’s website at <https://ecf.txeb.uscourts.gov/> and on the Debtors’ proposed Claims and Noticing Agent’s website at <https://cases.stretto.com/Spherature>. You can also request any pleading you need from the Debtors’ proposed counsel at: McDermott Will & Emery LLP, c/o

Jack Haake, Esq., 2501 North Harwood Street, Suite 1900, Dallas, Texas 75201  
(jhaake@mwe.com).

**III.**  
**CONCLUSION**

**WHEREFORE**, the Debtors and Yiru respectfully request that the Court (1) vacate the Order, (2) extend the objection period as to the Motion and the Motion to Lift Stay through and until June 26, 2021, (3), set the matter to be heard on July 13, 2021, along with the other matters to be heard at that omnibus hearing, (4) further extend the Bar Date to August 1, 2021, and (5) grant such other relief to which the Debtors may be entitled.

Respectfully submitted,

DATED: June 15, 2021

/s/ Marcus A. Helt

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***PROPOSED COUNSEL FOR THE DEBTORS  
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DATED: June 15, 2021

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**COUNSEL FOR COMMITTEE**

DATED: June 15, 2021

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**COUNSEL FOR MELODY YIRU**

**CERTIFICATE OF CONFERENCE**

I attest that concurrence in this filing has been obtained from all signatories above.

/s/ Jack G. Haake

Jack G. Haake

**CERTIFICATE OF SERVICE**

On June 15, 2021, I electronically submitted the foregoing document with the clerk of the court of the U.S. Bankruptcy Court, Eastern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve the parties individually or through their counsel of record, electronically, or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Jack G. Haake

Jack G. Haake